

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SEVEN NETWORKS, LLC, Plaintiff, v. GOOGLE LLC, Defendant.	Civil Action No. 2:17-cv-00442-JRG LEAD CASE JURY TRIAL DEMANDED
SEVEN NETWORKS, LLC, Plaintiff, v. SAMSUNG ELECTRONICS AMERICA, INC. AND SAMSUNG ELECTRONICS CO., LTD., Defendants.	Civil Action No. 2:17-cv-00441-JRG CONSOLIDATED CASE

**JOINT MOTION FOR ENTRY OF ORDER FOCUSING
PATENT CLAIMS AND PRIOR ART**

Plaintiff SEVEN Networks, LLC and Defendants Google LLC, Samsung Electronics America, Inc., and Samsung Electronics Co., Ltd. submit this joint motion for entry of an order focusing patent claims and prior art. As outlined in the order, this joint motion seeks to limit the number of patent claims and prior art asserted in the case in order to streamline the issues in the case.

Specifically, SEVEN has already voluntarily narrowed the number of asserted claims on July 23, 2018 in its Preliminary Election of Asserted Claims. On July 30, 2018, each Defendant has voluntarily narrowed the number of prior art references in their Preliminary Election of Asserted Prior Art. Not later than 7 days before the service of expert reports by the party with the burden of proof on an issue, SEVEN agrees to serve a Final Election of Asserted Claims, further narrowing the number of asserted claims as outlined in the attached order. Finally, by the date set for the service of expert reports by the party with the burden of proof on an issue, each Defendant agrees to serve a Final Election of Asserted Prior Art, further narrowing the number of prior art references as outlined in the attached order.

Dated: August 27, 2018

/s/ Max Ciccarelli (w/ permission)

Bruce S. Sostek
State Bar No. 18855700
Bruce.Sostek@tklaw.com
Max Ciccarelli
State Bar No. 00787242
Max.Ciccarelli@tklaw.com
Richard L. Wynne, Jr.
State Bar No. 24003214
Richard.Wynne@tklaw.com
Vishal Patel
State Bar No. 24065885
Vishal.Patel@tklaw.com
Nadia Haghighatian

Respectfully submitted,

/s/ Charles K. Verhoeven

Charles K. Verhoeven
charlesverhoeven@quinnemanuel.com
Sean S. Pak
seanpak@quinnemanuel.com
Brian E. Mack
brianmack@quinnemanuel.com
Jonathan Tse
jonathantse@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
Tel: 415-875-6600

State Bar No. 24087652
Nadia.Haghighatian@tklaw.com
Austin Teng
State Bar No. 24093247
Austin.Teng@tklaw.com
Matt Cornelia
State Bar No. 24097534
Matt.Cornelia@tklaw.com
THOMPSON & KNIGHT LLP
One Arts Plaza
1722 Routh St., Suite 1500
Dallas, Texas 75201
214.969.1700
214.969.1751 (Fax)

Samuel F. Baxter
Texas State Bar No. 01938000
sbaxter@mckoolsmith.com
MCKOOL SMITH, P.C.
104 E. Houston Street, Suite 300
Marshall, Texas 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

Theodore Stevenson, III
Texas State Bar No. 19196650
tstevenson@mckoolsmith.com
Eric S. Hansen
Texas State Bar No. 24062763
ehansen@mckoolsmith.com

MCKOOL SMITH, P.C.
300 Crescent Court, Suite 1500
Dallas, Texas 75201
Telephone: (214) 978-4000
Telecopier: (214) 978-4044

Attorneys for SEVEN Networks, LLC

Fax: 415-875-6700

Patrick D. Curran
patrickcurran@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
Tel: 212-849-7000
Fax: 212-849-7100

Lance Yang
lanceyang@quinnemanuel.com
Miles D. Freeman
milesfreeman@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Tel: 213-443-3000
Fax: 213-443-3100

Michael E. Jones
State Bar No. 10929400
mikejones@potterminton.com
POTTER MINTON LLP
110 N. College Avenue, Suite 500
Tyler, TX 75702
Telephone: (903) 597-8311
Facsimile: (903) 593-0846

Attorneys for Google LLC

/s/ Indranil Mukerji (w/ permission)
Ruffin B. Cordell
TX Bar No. 04820550
cordell@fr.com
Michael J. McKeon

D.C. Bar No. 459780
mckeon@fr.com
Indranil Mukerji
MA Bar 644059
mukerji@fr.com
Stephen A. Marshall
DC Bar 1012870
smarshall@fr.com
W. Peter Guarnieri
DC Bar 1010950
guarnieri@fr.com
FISH & RICHARDSON P.C.
The McPherson Building
901 15th Street NW, Suite 700
Washington, DC 20005
Telephone: (202) 783-5070
Facsimile: (202) 783-2331

Leonard E. Davis
TX Bar No. 05521600
ldavis@fr.com
FISH & RICHARDSON P.C.
1717 Main Street, Suite 5000
Dallas, TX 75201
Telephone: (214) 747-5070
Facsimile: (214) 747-2091

*Attorneys for Defendants Samsung
Electronics America, Inc. and Samsung
Electronics Co., Ltd.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on August 27, 2018 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Charles K. Verhoeven
Charles K. Verhoeven

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that Plaintiff SEVEN Networks, LLC and Defendants Google LLC, Samsung Electronics America, Inc., and Samsung Electronics Co., Ltd. met and conferred by email and phone on the issues. The parties reached an agreement on the issues.

/s/ Brian E. Mack